

TITLE 326 AIR POLLUTION CONTROL BOARD

#06-487 (APCB)

SUMMARY/RESPONSE TO COMMENTS FROM THE SECOND COMMENT PERIOD

The Indiana Department of Environmental Management (IDEM) requested public comment from November 1, 2006, through December 1, 2006, on IDEM's draft rule language. IDEM received comments from the following parties:

Eli Lilly and Company (ELC)

Following is a summary of the comments received and IDEM's responses thereto.

Comment: Lilly supports IDEM's proposal and encourages the Air Pollution Control Board to adopt these measures. It is sensible and efficient to extend the permit term for FESOPs and MSOPs to 10 years. Because sources are required to modify their permits whenever the facility changes or whenever applicable requirements change, the permits are generally kept current on a day-to-day basis. Consequently, renewal of an up-to-date permit is a *pro forma* process that may do nothing other than simply change the expiration date of the permit. The primary value of a permit renewal is to refresh the public involvement element of the permitting process and to process permit modifications that the site was not required to do earlier. Lilly agrees with IDEM that 10 years represents a reasonable period in balancing these interests.

Response: IDEM concurs and appreciates the support for the change to the permit term for minor source operating permits (MSOPs) and federally enforceable state operating permits (FESOPs).